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AISHAH BUENAVENTURA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case Nos. 17-CR-395-EMC-2
)	17-CR-401-EMC
Plaintiff,)	17-CR-402-EMC
)	
vs.)	
)	STIPULATION TO EXCLUDE TIME AND
AISHAH BUENAVENTURA,)	PROPOSED ORDER TO CONTINUE
)	STATUS CONFERENCE
Defendant.)	
)	
)	
)	

This matter is currently set for a status conference on March 28, 2018, at 2:30 p.m. The parties hereby stipulate to vacate that date and reset the status conference for Wednesday, April 25, 2018, at 2:30 p.m. Defense counsel is requesting that the status conference be continued to April 25, 2018, at 2:30 p.m., to allow counsel sufficient time to adequately prepare the defense. In particular, the parties are discussing a potential resolution of the case, and defense counsel needs additional time to discuss the discovery, case strategy, and the terms of any proposed resolution with Ms. Buenaventura. A continuance of this status conference will allow defense counsel the reasonable time necessary for effective preparation.

1 The defendant and the government consent to the extension of time, and the parties
2 represent that good cause exists for this extension, including the effective preparation of counsel.
3 The parties agree that the time between March 28, 2018 and April 25, 2018 should be excluded
4 under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B). The parties also
5 agree that the ends of justice are served by granting an extension of time and that an exclusion of
6 time outweighs the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C.
7 §3161(h)(7)(A).

8
9 SO STIPULATED.

10
11 Dated: March 23, 2018

_____/s/_____
COLIN L. COOPER
Attorney for AISHAH BUENAVENTURA

12
13
14 Dated: March 23, 2018

_____/s/_____
JULIE D. GARCIA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5)
6 UNITED STATES OF AMERICA,)

7 Plaintiff,)

8 vs.)

9)
10 AISHAH BUENAVENTURA,)

11 Defendant.)
12)
13)

Case Nos. 17-CR-00395-EMC-2

17-CR-00401-EMC


17-CR-00402-EMC

~~PROPOSED~~ ORDER

14 For the reasons stated above, the Court continues the above entitled matters to
15 Wednesday, April 25, 2018, at the hour of 2:30 p.m. The court also finds that the exclusion of
16 this period from the time limits applicable under 18 U.S.C. §3161 is warranted, and that the ends
17 of justice served by the continuance outweigh the interests of the public and the defendant in a
18 speedy trial for the periods from March 28, 2018 and April 25, 2018. *See* 18 U.S.C.
19 §3161(h)(7)(A); and that the failure to grant the requested exclusion of time would deny counsel
20 for the defendant the reasonable time necessary for effective preparation and continuity of
21 counsel, taking into account the exercise of due diligence, and would result in a miscarriage of
22 justice. *See* 18 U.S.C. §3161(h)(7)(B)(iv).

23 **IT IS SO ORDERED.**

24 DATED: March 26, 2018
25


HONORABLE EDWARD M. CHEN